

Federal Defenders  
OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201  
Tel: (718) 330-1200 Fax: (718) 855-0760

David E. Patton  
Executive Director and  
Attorney-in-Chief

Deirdre D. von Dornum  
Attorney-in-Charge

January 14, 2019

By email and ECF

The Honorable Roanne L. Mann  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Michael Brogan, 18 M 1206

Dear Judge Mann,

I write to request modifications of Mr. Brogan's bond conditions to allow him to travel to Southern California from January 16, 2019 to January 22, 2019 to visit with his uncle (who is ill), his cousin and his cousin's family and to change his home detention condition to a curfew while he is in California.

Mr. Brogan was arrested on December 12, 2018 and was released on a \$50,000 bond with condition of home detention later that day. Prior to his arrest, he had purchased an airline ticket from JFK to Long Beach, CA, planning to visit his uncle and other family in Fullerton, CA. He now asks the court to approve a modification of the bond to allow this travel. Both Pretrial Services and the government consent to the requested travel.

Mr. Brogan also asks the Court to modify the condition of home detention to a curfew while he is in California. Pretrial Services has objected to this modification, stating that there has not been a change in circumstances to warrant the change. I have not yet heard the government's position on the curfew request. Because the condition of home detention was instituted to ensure that Mr. Brogan stays away from the complaining witness (who lives in Washington, D.C.), he submits that being thousands of miles away is sufficient reason to modify the home detention condition to a curfew while he is in California.

Thank you for your attention to this matter.

*objection of  
Pretrial Services,*

Respectfully Submitted, and the

*/s/ seriousness of  
the charge, the*

Michael Schneider, Esq.

cc: Clerk of the Court (by ECF)  
AUSA Philip Selden (by email)  
PTSO Amanda Carlson (by email)

*Court declines to elaborate the  
home detention condition during  
Mr. Brogan's visit; instead,  
he is to remain on home detention  
at his uncle's home while in Southern  
California. so ORDERED:*

*/s/ RLM  
1/14/19*